

AO 91 (Rev. 5/85) Criminal Complaint

# United States District Court

NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION

**FILED**  
FEB - 6 2003  
Magistrate Judge P. Michael Mahoney  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

NOUMAN KHAN  
1145 John Drive  
Hoffman Estates, IL

## CRIMINAL COMPLAINT

CASE NUMBER: 03 CR 50012

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 3, 2003, in Winnebago county, in the

Northern District of Illinois, Western Division, defendant(s) did, (Track Statutory Language of Offense) knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation of a material fact within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, namely that an identified person would be traveling from Hong Kong to Chicago carrying with her an extremely deadly biological virus which she would use to kill thousands of people in Chicago, whereas, as defendant then well knew, the identified person did not and would not possess or intend to possess any such virus,

in violation of Title 18, United States Code, Section(s) 1001(a)(2).

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following Official Title

facts:

SEE ATTACHED AFFIDAVIT WHICH IS ATTACHED HERETO AND INCORPORATED HEREIN

**DOCKETED**

FEB 10 2003

Continued on the attached sheet and made a part hereof:

Yes  No

  
 FBI Special Agent Jeremy Ashcroft

Signature of Complainant

Sworn to before me and subscribed in my presence,

02-07-2003

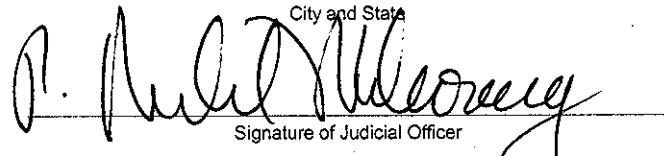
Date

P. Michael Mahoney  
United States Magistrate Judge

Name &amp; Title of Judicial Officer

Rockford, IL

City and State

  
 Signature of Judicial Officer

NORTHERN DISTRICT OF ILLINOIS )  
WESTERN DIVISION ) SS  
                                )

**AFFIDAVIT**

I, Jeremy Ashcroft, being duly sworn on oath, hereby state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed for approximately 4 months.
2. As a Special Agent with the FBI, my duties include the investigation of alleged violations of federal criminal laws, including 18 U.S.C. §1001(a)(2), which makes it unlawful for anyone to knowingly and willfully make material false statements regarding any matter within the jurisdiction of the government of the United States.
3. During the performance of my duties as a Special Agent with the FBI, I have participated with other law enforcement officers and agents in the investigation of allegations that NOUMAN KHAN made material false statements to the FBI concerning a purported terrorist threat.
4. The information contained in this affidavit is based upon information obtained personally by me and information provided me by other law enforcement agents and officers who have participated in this investigation. This affidavit does not contain all the information known as a result of this investigation, but only those facts which I believe are necessary to establish probable cause for the Complaint to which the affidavit is attached.
5. On Monday, February 3, 2003, the Rockford, IL office of the FBI received an anonymous letter dated January 31, 2003. With exception of the replacement of the name of an innocent person with the phrase "Jane Doe," the body of that letter reads as follows:

A Chinese girl by the name of "Jane Doe" will be travelling from Hong Kong to Chicago in the next couple of days. She will be carrying with her an extremely deadly kind of biological virus. She will use this virus to kill thousands of people in Chicago. Once this virus starts spreading it will be impossible to stop it.

"Jane Doe" has to be stopped. She is a pro and it will be extremely hard for you find out that little quantity of virus she will be carrying. But you have to find it. Its your job to find out how she plans to bring this lethal virus in United States. She will be staying in Schaumburg, IL

When millions of Americans die don't say that you were not alerted beforehand.

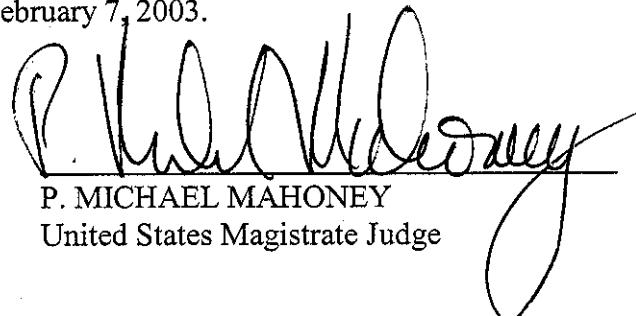
6. On Tuesday, February 4, 2003, the "Jane Doe" named in the anonymous letter described in paragraph 5 above was interviewed. During the interview, "Doe" was excluded as a suspect in any kind of terrorist incident. When asked by interviewing agents, "Doe" identified NOUMAN KHAN (hereinafter "KHAN") as the person who might have written the above-described anonymous letter. "Doe" reported that since she replaced KHAN as the person in charge of a project at their mutual place of employment, KHAN had engaged in a course of harassment of her. "Doe" reported to the interviewing agents that she had returned to Chicago on February 2, 2003 from a vacation in Hong Kong, and that KHAN was aware of her travel plans.

7. On Wednesday, February 5, 2003, KHAN was interviewed outside his residence at 1145 John Drive, Hoffman Estates, IL. During the interview, KHAN initially denied writing the anonymous letter described in paragraph 5 above, but later admitted that he was the author of that letter. KHAN acknowledged that he had drafted and printed the letter at his place of employment in Deerfield, IL and had mailed the letter to the FBI from a Post Office located at the intersection of Golf and Gannon Roads. KHAN admitted the letter was a hoax which he had written it because he was upset with the person identified in the letter over complaints she had made about KHAN to their mutual employer.



JEREMY ASHCROFT  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on February 7, 2003.



P. MICHAEL MAHONEY  
United States Magistrate Judge